

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:

KRISJENN, RANCH, LLC, DBA as
KRISJENN RANCH, LLC-SERIES
UVALDE RANCH; and
KRISJENN RANCH, LLC SERIES
PIPELINE ROW,

Bankruptcy Case No. 20-50805-RBK
(CHAPTER 11)

Debtors,

DMA PROPERTIES, INC., et al.,

Appellees,

v.

Adversary No. 20-5027-RBK

KRISJENN RANCH, LLC,
et al.,

Appellants.

**KRISJENN RANCH, LLC, KRISJENN RANCH, LLC-SERIES UVALDE RANCH, AND
KRISJENN RANCH, LLC-SERIES PIPELINE ROW'S MOTION FOR LEAVE OF
COURT TO FILE DESIGNATION OF TRANSCRIPT, DESIGNATION OF ITEMS FOR
APPELLATE RECORD, AND STATEMENT OF ISSUES**

TO THE HONORABLE BANKRUPTCY JUDGE RONALD B. KING:

COME NOW Plaintiffs and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row (collectively the "Appellants") and file their First Motion for Leave of Court to File Designation of Transcript, Designation of Items for Appellate Record, and Statement of Issues and would show the Court as follows:

1. Appellants filed their Notice of Appeal on April 5, 2024. The deadline to file a designation of transcript, designation of items for appellate records, and statement of the

issues was due April 19, 2024.

2. On April 23, 2024, DMA Properties, Inc. Frank Daniel Moore (collectively “DMA”), Longbranch Energy, LP (“Longbranch”) filed their Motion for Attorney’s Fees.

3. Appellants’ response to DMA and Longbranch’s Motion for Attorney’s Fees is due May 7, 2024.

4. Appellants request the deadline to submit their designation of transcript, designation of items for appellate records, and statement of issues be extended until two weeks after the final ruling on DMA and Longbranches’ Motion for Attorney Fees is entered.

5. This case is not final because the Court has not ruled on attorney’s fees. Appellant’s Notice of Appeal should be treated as filed on the date the Court enters judgment on the remaining issue of attorney’s fees. FED R. APP. PRO. 4(a)(2).

WHEREFORE, PREMISES CONSIDERED, Appellants request the court grant them leave of the Court and extend the deadline to file their designation of transcript, designation of items for appellate records, and statement of issues until two weeks after the ruling of DMA and Longbranches’ Motion for Attorney’s Fees is entered, and grant other such relief to which Appellants may be entitled.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 26th day of April 2024:

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